

Joseph W. Cotchett (36324; jcotchett@cpmlegal.com)
 Steven N. Williams (175489; swilliams@cpmlegal.com)
 Nanci E. Nishimura (152621; nnishimura@cpmlegal.com)
 Aron K. Liang (228936; aliang@cpmlegal.com)
 Douglas Y. Park (233398; dpark@cpmlegal.com)

COTCHETT, PITRE & McCARTHY

San Francisco Airport Office Center
 840 Malcolm Road, Suite 200
 Burlingame, CA 94010
 Telephone: (650) 697-6000
 Fax: (650) 697-0577

Walter J. Lack (57550; wlack@elllaw.com)
 Elizabeth L. Crooke (90305; ecrooke@elllaw.com)
 Richard P. Kinnan (123170; rkinnan@elllaw.com)

ENGSTROM LIPSCOMB & LACK

10100 Santa Monica Blvd., 16th Floor
 Los Angeles, CA 90067
 Telephone: (310) 552-3800
 Facsimile: (310) 552-9434

*Attorneys for Plaintiffs Wortman, Adams and Garcia,
 and the Proposed Class*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

**DONALD WORTMAN, WILLIAM
 ADAMS, MARGARET GARCIA,**
 individually and on behalf of all others
 similarly situated,

Plaintiffs,

vs.

**AIR NEW ZEALAND, ALL NIPPON
 AIRWAYS, CATHAY PACIFIC
 AIRWAYS, CHINA AIRLINES, EVA
 AIRWAYS, JAPAN AIRLINES
 INTERNATIONAL, MALAYSIA
 AIRLINES, NORTHWEST AIRLINES,
 QANTAS AIRWAYS, SINGAPORE
 AIRLINES, THAI AIRWAYS,
 UNITED AIRLINES,**

Defendants

Case No. 07-cv-05634-CRB

MDL No. 1913

**DECLARATION OF STEVEN N.
 WILLIAMS IN SUPPORT OF PLAINTIFF
 WORTMAN, ADAMS AND GARCIA'S EX
 PARTE MISCELLANEOUS
 ADMINISTRATIVE REQUEST FOR
 ISSUANCE OF LETTERS ROGATORY**

**DECLARATION OF STEVEN N. WILLIAMS IN SUPPORT OF PLAINTIFF
 WORTMAN, ADAMS AND GARCIA'S EX PARTE MISCELLANEOUS
 ADMINISTRATIVE REQUEST FOR ISSUANCE OF LETTERS ROGATORY
 Case No. 07-cv-05634-CRB; MDL No. 1913**

1 I, Steven N. Williams, declare as follows,

2 1. I am a partner with the law firm of Cotchett, Pitre & McCarthy. I am an attorney
3 in good standing and an active member of the State Bar of California. I make this declaration
4 on behalf of Plaintiffs Donald Wortman, William Adams, and Margaret Garcia ("Plaintiffs"),
5 except where noted, of my own personal knowledge and, if called and sworn as a witness, could
6 and would testify competently to the facts that it contains. I make this declaration pursuant to
7 28 U.S.C. §1746.

8 2. Plaintiffs retained the service of APS International, Ltd. ("APS"), a company that
9 specializes in foreign service of process, to effect service of process on a number of foreign
10 Defendants in this action, including Air New Zealand, All Nippon Airways, Cathay Pacific
11 Airways, China Airlines, Eva Airways, Japan Airlines International, Malaysia Airlines, Qantas
12 Airways, Singapore Airlines, and Thai Airways. It is my understanding, based on my review of
13 these companies' websites and other documents, that each of these entities maintains their
14 principal place of business in one of the following places: Australia, Hong Kong, Japan,
15 Malaysia, New Zealand, Singapore, Taiwan or Thailand.

16 3. Attached hereto as Exhibit A is a true and correct copy of a letter dated
17 November 8, 2007, from APS International, Ltd. to Jaclyn Verducci, a paralegal at my firm,
18 regarding service in Australia.

19 4. Attached hereto as Exhibit B is a true and correct copy of a letter dated
20 November 8, 2007, from APS International, Ltd. to Jaclyn Verducci, a paralegal at my firm,
21 regarding service in Malaysia.

22 5. Attached hereto as Exhibit C is a true and correct copy of a letter dated
23 November 8, 2007, from APS International, Ltd. to Jaclyn Verducci, a paralegal at my firm,
24 regarding service in New Zealand.

25 ///

26 ///

27

28 **DECLARATION OF STEVEN N. WILLIAMS IN SUPPORT OF PLAINTIFF
WORTMAN, ADAMS AND GARCIA'S *EX PARTE* MISCELLANEOUS
ADMINISTRATIVE REQUEST FOR ISSUANCE OF LETTERS ROGATORY
Case No. 07-cv-05634-CRB; MDL No. 1913**

6. Attached hereto as Exhibit D is a true and correct copy of a letter dated November 8, 2007, from APS International, Ltd. to Jaclyn Verducci, a paralegal at my firm, regarding service in Singapore.

7. Attached hereto as Exhibit E is a true and correct copy of a letter dated November 8, 2007, from APS International, Ltd. to Jaclyn Verducci, a paralegal at my firm, regarding service in Taiwan.

8. Attached hereto as Exhibit F is a true and correct copy of a letter dated November 8, 2007, from APS International, Ltd. to Jaclyn Verducci, a paralegal at my firm, regarding service in Thailand.

9. I am informed and believe that APS has advised counsel for the Plaintiff that Plaintiff should obtain two duplicate originals of each Letter Rogatory, each bearing the Judge's original handwritten signature and the Court's seal.

10. I am informed and believe that the United States Department of State strictly requires that all documents that it transmits in this process be either original documents or certified copies. Service by Letters Rogatory must follow a specific format, and the documents must go through diplomatic channels. To that end, Plaintiffs are also seeking from the Clerk of the Court certified copies of all documents to be served.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 28, 2008, in Burlingame, California.

/s/ Steven N. Williams
Steven N. Williams

**DECLARATION OF STEVEN N. WILLIAMS IN SUPPORT OF PLAINTIFF
WORTMAN, ADAMS AND GARCIA'S *EX PARTE* MISCELLANEOUS
ADMINISTRATIVE REQUEST FOR ISSUANCE OF LETTERS ROGATORY
Case No. 07-cv-05634-CRB; MDL No. 1913**